

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: February 28, 2018
2. Name of companies covered by this certification and Form 499 Filer IDs:

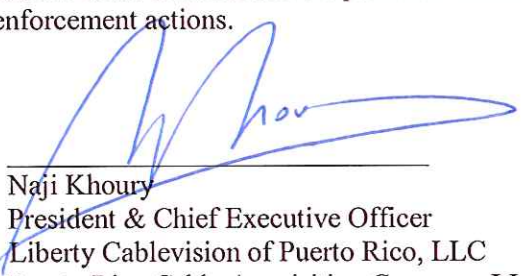
Liberty Cablevision of Puerto Rico, LLC	826287
Liberty Cablevision of PR LLC	825990
Puerto Rico Cable Acquisition Company LLC	827792
3. Name of signatory: Naji Khoury
4. Title of signatory: President & Chief Executive Officer
5. Certification:

I, Naji Khoury, certify that I am an officer of Liberty Cablevision of Puerto Rico, LLC, Liberty Cablevision of PR LLC and Puerto Rico Cable Acquisition Company LLC (together, "LCPR"), and, acting as an agent of the each of these companies, that I have personal knowledge that LCPR has established operating procedures, summarized in the attached statement, that are adequate to ensure compliance with the customer proprietary network information ("CPNI") rules as set forth in Part 64, Subpart U of the Commission's rules, 47 C.F.R. §§ 64.2001 *et seq.* LCPR is consolidating all Puerto Rico operations in Liberty Cablevision of Puerto Rico, LLC, which now serves all areas previously served by its former operating affiliates Liberty Cablevision of PR LLC and Puerto Rico Cable Acquisition Company LLC. For avoidance of doubt, all three entities are named in this certification.

Attached to this certification is an accompanying statement explaining how LCPR's procedures ensure that it is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

LCPR has not received any customer complaints in the past calendar year concerning unauthorized release of CPNI. LCPR has not taken any actions in the past calendar year against data brokers, including proceedings instituted or petitions filed by the company at either the Telecommunications Regulatory Board of Puerto Rico, the court system, or the Commission.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject the Company to enforcement actions.

  
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Naji Khoury  
President & Chief Executive Officer  
Liberty Cablevision of Puerto Rico, LLC  
Puerto Rico Cable Acquisition Company LLC  
Liberty Cablevision of PR, LLC  
Executed February 27, 2018

ACCOMPANYING STATEMENT TO  
Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Liberty Cablevision of Puerto Rico, LLC (hereinafter LCPR) has established adequate procedures to ensure that it is in compliance with Section 222 of the Communications Act and the requirements set forth in section 64.2001 *et seq.* of the Federal Communications Commission's rules (hereinafter the Rules). These procedures include the following:

1. LCPR will use, disclose, or permit access to individually identifiable CPNI only in its provision of the communications service from which such information is derived; for services necessary to, or used in, the provision of such communications service, including the publishing of directories; to initiate, render, bill and collect for communications services; to protect its rights or property, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to provide inside wiring installation, maintenance, or repair services; as required by law; or as expressly authorized by the customer.
2. Access to LCPR's customers' CPNI is restricted, available only to LCPR's employees as necessary to perform their duties as part of LCPR's provision of its VoIP service.
3. LCPR has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Customers are properly authenticated prior to disclosing CPNI based on customer-initiated telephone contact, online account access, or an in-store visit.
4. LCPR does not use CPNI to market service offerings among the different categories of service, or even within the same category of service, that it provides to subscribers. Although its current policy is not to use CPNI for marketing, in the event that any employee or agent wishes to use CPNI for marketing or to seek customer approval for such use, such proposed use is subject to a supervisory review process.
5. LCPR does not disclose or otherwise permit the availability of CPNI to joint venture partners, independent contractors or any other third party for marketing purposes.
6. LCPR does not provide Call Detail Information (information about calls placed to or from customer's telephone service) to inbound callers. LCPR may provide Call Detail Information to customer's address of record, by calling the customer's telephone number of record, to the customer in person upon presentation of photo identification that meets the requirements of the next section of this policy, or through the password-protected online account.
7. LCPR personnel at company offices may disclose a customer's CPNI to an authorized person only upon verifying that person's identity through a valid, non-expired government-issued photo ID (such as a driver's license, passport, or comparable ID) matching the customer's account information.
8. LCPR has approved and trained its Customer Service personnel and other personnel with access to CPNI on its CPNI policies, including during customer-initiated telephone account access requests and in-store visits, to protect against pretexting and unauthorized attempts to access CPNI. LCPR requires proper training of all such personnel with regard to when they are and are not authorized to use or disclose CPNI, and all such personnel are required to implement such policy, subject to a disciplinary process which can lead to immediate suspension and even

termination or referral to criminal enforcement authorities depending on the gravity of the circumstances.

9. Customers must enter a password to access CPNI from LCPR's online portal. The password or a link to establish a password is sent to the customer's address of record. If customer forgets their password, they may request a new password to be sent to their address of record.
10. LCPR has established the procedures to immediately send a notification to the customer pursuant to the Rules, whenever a password, online account, or address of record is created or changed, and without revealing the changed information, except that no such notifications are required when the customer initiates service.
11. As part of its policy and procedures for CPNI Protection, in regard to any type of administrative (law enforcement) or court subpoena, or under request by any third party (i.e., anyone other than the properly authenticated customer him/herself), without exception, all such CPNI requests are sent to LCPR's CPNI agent in the Legal Department for proper action. LCPR's CPNI agent (and back-up personnel) is prepared to adequately act upon valid law enforcement requests.
12. A "breach" of CPNI has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI. Within seven business days upon learning of a breach, LCPR's CPNI agent in the Legal Department shall electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) by accessing the following link: <https://www.cpnireporting.gov>. LCPR will not notify customers or disclose a breach to the public until 7 full business days have passed after notification to the USSS and the FBI, and will defer such notification at the request of either agency.
13. LCPR does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers. When LCPR receives or obtains proprietary information from another carrier for purposes of providing a telecommunications service, it shall use such information only for such purpose, and shall not use such information for its own marketing efforts.
14. LCPR will maintain for at least two years a record, electronically or in some other manner, of any breaches discovered, notifications made to the USSS and the FBI pursuant to these procedures, and notifications of breaches made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. LCPR maintains a record, for a period of at least one year, of those limited circumstances in which CPNI is disclosed or provided to third parties or where third parties were allowed access to CPNI. If LCPR later changes its policies to permit the use of CPNI for marketing, it will revise its recordkeeping policies to comply with the Commission's recordkeeping requirements. LCPR maintains a record of all customer complaints related to their handling of CPNI, and records of LCPR's handling of such complaints, for at least two years. LCPR's CPNI agent in the Legal Department will assure that all complaints are reviewed and that LCPR considers any necessary changes to its policies or practices to address the concerns raised by such complaints.